



Preliminary Roost Assessment Survey

Charnwood Cottage, Reading, RG4 7EB

Mr & Mrs Hutchins

Status	Issue	Name	Date
Draft	1	Josephine McCarthy, Consultant (Natural England bat licence number: 2019-41480-CLS-CLS).	16/08/2021
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Executive summary

Arbtech Consulting Limited was commissioned by Mr & Mrs Hutchins to carry out a Preliminary Roost Assessment, (PRA) at Charnwood Cottage, Reading, RG4 7EB. The survey was completed on 16th August 2021. The aim of the assessment was to search for bats/field signs of bats and to consider the value and suitability of the structures for roosting bats. The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of presence or signs of breeding birds, and the suitability of the site for barn owls.

Project description

The development proposals are currently described as ‘two storey extension and alterations.’ A planning application is being prepared for submission to Reading Borough Council.

Summary of Recommendations - This is work you will need to commission (if any) to obtain planning permission and comply with legislation.

Building Ref:	Summary	Recommendations
B1	No impacts on bats or their roosts are anticipated as a result of the proposed works. In line with Good Practice Guidelines (Collins, J. (Ed) 2016, the building is assessed to have a ‘negligible’ habitat value for supporting roosting bats. There is no evidence of bats inside the roof-space. Due to the well maintained appearance of the exterior features, including the roof tiles, soffits and the brickwork on all elevations, the building has negligible roosting habitat for bats on the outer surfaces. There are no features that meet the criteria for further survey.	Further surveys are not recommended for this site due to a lack of evidence of bat use and a lack of suitable habitat for roosting bats to exploit. The development works can proceed without risk of breach of legislation in terms of disturbance to bats. In the unlikely event that bats are found during any stage of the development, work should stop immediately and a suitably qualified ecologist should be contacted for advice. New lighting schemes for the developed site should follow guidance from the Bat Conservation Trust. (See, recommendations, (p.15-16). The creation of additional habitat for bats is recommended in line with the local authorities’ duty to ask for enhancements under the NPPF, (July 2021). (p.15-16).

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1.0 Introduction and Context

1.1 Background

The assessment is informed by the Bat Conservation Trust publication, *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (Collins, J. (Ed) 2016). No previous reports have been produced by Arbtech.

1.2 Site Context

The site is located at National Grid Reference SU 6935 7545 and has an area of approximately 0.1ha. There is one dwelling within the survey boundary, designated B1 in this report.

1.3 Scope of the report

This report provides a description of all features suitable for roosting bats and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on constraints to the proposals as a result of roosting bats, and summarises the requirements for any further surveys, to inform subsequent mitigation proposals, achieve Planning or other statutory consent, and to comply with wildlife legislation.

The aim of the assessment was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how they could use the site. To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken, including an external survey and internal inspection where possible.
- An outline of likely impacts on any known roosts has been provided, based on current development proposals.
- Recommendations for further survey and assessment have been made, along with advice on the requirements of a European protected species mitigation Licence (EPSML) application if appropriate.

The site location is shown in Appendix 1, site plans and proposed plan in Appendix 2, (where provided) and desk study results in Appendix 3. Relevant legislation is presented in Appendix 4.

1.4 Project Description

The development proposals are currently described as ‘two storey extension and alterations.’ A planning application is being prepared for submission to Reading Borough Council.

2.0 Methodology

2.1 Desk Study methodology

The desk study included a 2km radius review of statutory and non-statutory designated sites, Biodiversity Action Plan (BAP) Priority Habitats and granted EPSML records for bats held on Magic database. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps.

Existing bat records relating to the site and a surrounding 2km radius are required to conform to national guidelines. The data search is confidential information that is not suitable for public release and has been analysed and summarised for presentation in this report.

2.2 Site Survey methodology

The survey was undertaken by Josephine McCarthy (Natural England bat licence number: 2019-41480-CLS-CLS).

All features that will be impacted by the project proposals were assessed for their bat roosting and/or commuting habitat. The surveyor systematically surveyed all features suitable for bats and signs of bat activity.

For any surveyed buildings:

A non-intrusive visual appraisal from the ground using binoculars, inspecting the external features of the building(s) for potential access/egress points, and for signs of bat use. An internal inspection of the building was also made, including the living areas of derelict or abandoned buildings and the accessible roof spaces of all buildings, using an endoscope, torch and ladders. The surveyor paid particular attention to the floor and flat surfaces, window shutters and frames, lintels above doors and windows, and carried out a detailed search of numerous features within the roof space.

For any surveyed trees:

A visual inspection from ground level using binoculars and where accessible and safe to do so, an internal inspection of potential roosting features using an endoscope, torch and ladders.

2.3 Breeding birds and other incidental observations

The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of presence or signs of breeding birds, and the suitability of the site for barn owls *Tyto alba*.

2.4 Suitability Assessment

All affected survey features on site were categorised according to the likelihood of bats being present, in line with best practice guidelines (Collins, J. (ed) 2016). The features that dictate the likelihood of roosting bats are summarised in Tables 1 and 2 below. Roost suitability is classified as high, moderate, low and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Likelihood of bats being present	Feature of building and its context
Higher	Buildings/structures with features of particular significance for roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland. Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data).
Lower	A small number of possible roost sites/features, used sporadically by more widespread species. Habitat suitable for foraging in close proximity, but isolated in the landscape. Or an isolated site not connected by prominent linear features. Few features suitable for roosting, minor foraging or commuting.

Table 2: Features of a tree that are correlated with use by bats

Likelihood of bats being present	Feature of tree and its context
Higher	A tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Lower	A tree of sufficient size and age to contain potential roosting features but with none seen from the ground or features seen with only very limited roosting potential.

2.5 Limitations

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study.

Limitations:

- External: There were no external limitations to the survey. A full external survey from ground level was conducted.
- Internal: There is no significant loft space as the roof space comprises living space, (bedrooms). A roof was created over the bedrooms when the house was previously extended. A small loft space has been retained above the hall to house a water tank. A narrow space occurs at the eaves (<0.25m). These areas are too narrow to enter and were inspected from the loft hatch. The spaces are well sealed externally with no points of entry for bats identified and no evidence of bats seen inside. As such, this limitation is not thought to significantly affect the survey findings.

3.0 Results and Evaluation

3.1 Desk Study Results

For ease of reading, relevant findings from the desk study are incorporated into **Conclusions, Impacts & Recommendations (4.0)**. Full results are available in Appendix 3.

3.2 Field Survey Results

The weather conditions recorded at the time of the survey are shown in Table 3.

Table 3: Weather conditions during the survey

Date: 16/08/2021	
Temperature	20.6 °C
Humidity	45%
Cloud Cover	40%
Wind	8mph
Rain	None

3.6 Site Feature descriptions and photos follow

B1 – southernmost elevation. (front).

B1 is a detached dwelling. The roof was converted to living space, (bedrooms) during previous development work which included the installation of dormer windows into the front and rear elevations of the roof.

As a result, there is no internal loft-space present aside from a small space above the hall, approx. 1m² (which houses a water tank). A narrow space extends from this space below the ridge. (pictured later). There is minimal habitat inside the building which bats could exploit for roosting. Void dwelling species of bat are considered absent from the interior.

Pictured opposite is the front (south elevation) of B1.



B1- South elevation.

B1 – northermost elevation, (rear).

The rear roof pitch contains roof lights and two flat-roofed dormer windows clad in concrete-mix tiles.

The exterior of the building contains a high number of tiles including hanging tiles on the front and rear dormer windows and bats are known to seek out gaps in hanging tiles for day roosting. However, the building appears to have been well maintained. The roof tiles and the hanging tiles are all intact and tight-fitting. There are no missing, loose or raised examples present and there are no gaps between the tiles which bats could exploit.

**B1 –Southernmost elevation (front).**

The dormer windows were inspected closely for suitable habitat for roosting bats. The hanging tiles, the apex and the verge tiles on all dormers are well mortared with no gaps. The soffits appear as new and are well sealed to the dormer roofs. The lead flashing at the base of all dormer windows is tightly addressed to the roof tiles. There were no suitable gaps for roosting bats within the tiles.

**B1 – south elevations (front).**

Showing the gapless condition of the roof tiles, and the hanging tiles on the dormer windows.



B1 - northernmost elevations (rear).

Showing an example of the intact roof tiles on the north elevation. The lead flashing at the base of the chimney is well sealed to the chimney and to the roof. The flashing around the roof-light has no gaps which bats could utilize.

**B1 – northwest elevations**

Showing the hanging tiles and the lead flashing on the westernmost dormer window with an absence of gaps for roosting bats.

**B1 – north (rear) elevation.**

Showing an example of the tight-fitting soffits on the north (rear) of the building. The picture opposite is representative of the condition of the soffits on all elevations. The soffits appear as new with no linear gaps between the soffits and the brickwork noted and no points of entry for roosting bats identified.



B1 – south, (front) elevation.

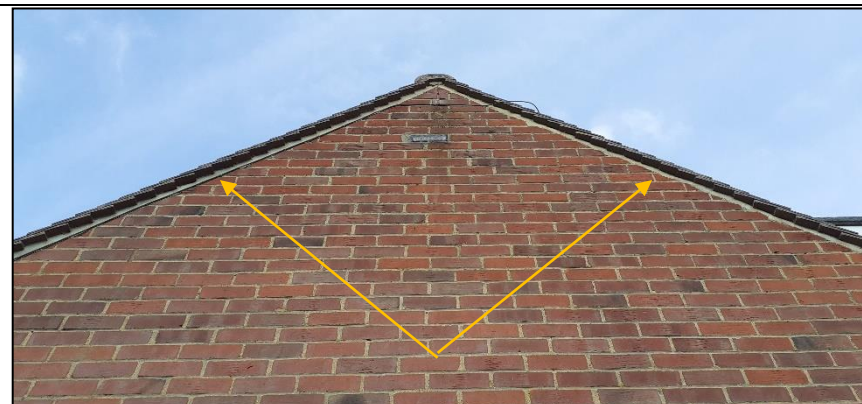
Showing an example of the tight-fitting soffits on the south elevation.

The walls and the floors below the soffits on all elevations were inspected for evidence of recent bat use, e.g. bat droppings, (bat droppings can persist short-term in favourable weather conditions). No evidence of bat use was seen.

**B1 – East gable wall.**

The verge tiles and the apex tiles are well mortared with no gaps which bats could use for roosting or to gain access to the interior.

The brickwork across the building appears in excellent repair with no holes or cavities of bat value identified.

**B1- west gable wall.**

The west gable is equally well sealed with no points of entry for bats identified.



B1 – internal

A small void space, large enough to house a water tank is present inside the roof. The void space is lined with bitumen of excellent repair with no tears and no gaps noted.

No daylight enters the roof-space from any angle.

**B1 – internal**

There are bedrooms either side of this void; however, a narrow gap is retained above the bedrooms (below the ridge- pictured opposite). The gap is less than 0.25m height and width. (max). It was not possible to enter the space; however, a high powered lamp was used to inspect the space from the loft hatch.

The roof timbers, the loft insulation and the eaves within reach, were inspected for evidence of bats. The floor and the water tank were all inspected for bat droppings. No evidence of bats was seen.

**B1 – internal.**

Looking into the narrow void below the ridge.

There were no points of entry for bats on the outer surfaces and no evidence of bat use was found during the survey.



4.0 Conclusions, Impacts and Recommendations

4.1 Informative guidelines

Bats are protected under the Wildlife and Countryside Act and Conservation Regulations (see Appendix 4 for a summary of legislation protecting bats in the UK). Legislation protects all wild birds whilst they are breeding, and prohibits the killing, injuring or taking of any wild bird or their nests and eggs. Certain species of bird, including the barn owl, are subject to special provisions; it is an offence to disturb any bird or their young during the breeding season.

There are three possible outcomes of this survey, each with specific recommendations. These are outlined below:

Confirmed bat roost

Best practice survey guidelines (Collins, 2016) recommends additional surveys for confirmed roosts. Three further surveys are required to characterise the bat roost present including species, roost type and access points to inform a European protected species mitigation licence (EPSML) application with Natural England. Surveys must be completed during the active bat season (May – September). At least two of the surveys should be completed during the optimal survey period mid-May to August, and at least one of the surveys should be a dawn re-entry survey (Collins, J. 2016).

Low, moderate or high likelihood of a bat roost present

Best practice survey guidelines (Collins, 2016) recommends additional surveys for features assessed as having low to high suitability for roosting bats. One, two or three further surveys are required to confirm presence/likely-absence of a bat roost, based on a low, medium or high roost likelihood evaluation. Surveys must be completed during the active bat season (May – September). If more than one survey is recommended, at least one of them should be completed during the optimal survey period mid-May to August, and at least one of the surveys should be a dawn re-entry survey (Collins, J. 2016). If two or one further survey is recommended these surveys must be completed during the optimal survey period (mid-May to August). For low and moderate roost likelihood evaluation the survey effort recommended at this stage is iterative and if bats roosts are confirmed in the building, a further survey will be required to provide sufficient information to inform an EPSML application to Natural England.

Negligible likelihood of a bat roost present

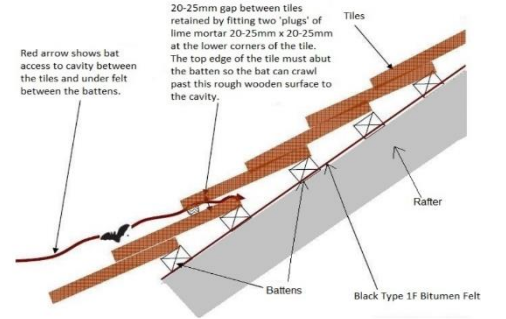
Buildings assessed as comprising negligible suitability for roosting bats do not normally require further surveys. However, if bats are found during any stage of the development, work should stop immediately and a suitably qualified ecologist should be contacted for further advice.

4.2 Evaluation

Taking the desk-based assessment and site survey results into account, the following value for roosting bats has been placed on each site survey feature.

Table 4: Evaluation of buildings on site

Ref	Survey assessment conclusions (with justification)	Foreseen impacts	Recommendations	Enhancements The Local Planning Authority has a duty to ask for enhancements under the NPPF (July 2021)
B1	There is no evidence of bat use inside the roof-space and no ingress/egress points for bats were identified to the interior. As all parts of the roof structure have been extensively altered and as the roof space is largely living space, it is unlikely a historical bat roost could be present or that the building could be host to a bat roost of void dwelling species of bat. The exterior of the building, including the soffits, the roof tiles and the brickwork have been well maintained. There is an absence of holes, gaps or crevices which could support crevice dwelling species of bat on the exterior surfaces. A search of the floor, walls and window sills around the building and below the eaves found no evidence of bat use. Due to a lack of suitable external features and a lack of evidence of bat use within the roof-space, the building is assigned a 'negligible' habitat value for roosting bats in line with Good Practice Guidelines (Collins, J. (Ed) 2016. There are proximate habitats of value for bats, including deciduous woodland boundaries within 30m of the site contiguous with ancient woodlands within 500m. The River Thames is approx. 300m south with large tracts of grasslands and dark-sky habitat connecting these habitats to the site, all of which bats could use regularly for foraging, roosting and commuting. A search of the Magic.gov.uk database shows that seven EPS licences have been previously issued for	The proposals are for extensions and alterations which will include additional works to the roof. As the building has no suitable features for roosting bats, there will be no impacts on bats as a result of these works and no suitable bat habitat will be lost to the development. However, bats are known to use nearby development for roosting and bats could roost, forage and commute in close proximity to the site. Proximate bats could be impacted by any significant changes to the current lighting scheme if not mitigated for.	Further surveys are not recommended for this site. The development works can proceed without risk of breach of legislation in terms of disturbance to bats. In the highly unlikely event that bats are found during any stage of the development, work should stop immediately and a suitably qualified ecologist should be contacted for advice. Lighting Low impact lighting strategies will be adopted from the guidance outlined in the new Bats and Lighting Publication produced by the Institution of Lighting Professionals and the Bat Conservation Trust "Guidance Note 08/18 Bats and artificial lighting in the UK Bats and the Built Environment series publication: http://www.bats.org.uk/news.php/406/new_guidance_on_bats_and_lighting. The lighting on the site will: • Use narrow spectrum light sources to lower the range of species affected by lighting • Use light sources that emit minimal ultra-violet light • Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to	To enhance the value of the site for bats and to secure onsite gains for biodiversity, it is recommended that habitat enhancements are included as part of the development: Integrated bat boxes, including bat bricks and bat access tiles, can be incorporated into the new walls or new roofs during construction to provide additional bat roosting habitat on site. Integrated products can be obtained from: https://www.nhbs.com/ Install: 2 x Integrated Eco Bat Box (or suitable alternative). Or 2 x 1FE Schwegler Bat Access Panel, (or suitable alternative). Or Habitat Bat Box - Custom Brick Facing Search (nhbs.com) Bat boxes can be installed within the walls or attached externally. Bat boxes should be positioned 3-5m above ground level facing in a south/south-westerly direction with a clear flight path to and from the entrance. Bat boxes should also be positioned away from any artificial light sources. Additionally, any new roof tiles can be laid in such a way as to leave gaps between the tiles which bats could use for roosting. The new

confirmed bat roosts within 2km of the site. Six of these occur within 1km. The nearest record occurs <150m east of the site. The next nearest records are equidistant at approx. 450m. The records are for day roosts and for breeding roosts of soprano pipistrelles species of bat, and for day roosts for common pipistrelle and brown long eared species of bat. The records date between 2013-2021 and confirm that at least three common species of bat are known to use nearby structures for roosting.		manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin. • Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal. Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only. External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on. Wall lights and security lights will be ‘dimnable’ and set to the lowest light intensity settings. There are several products on the market that allow the control of the light intensity and the duration that the lights are on. All lighting on the developed site will make use of the most up to date technology available.	roof tiles can be adapted by maintaining a 20-25mm gap below occasional tiles. The gaps can be created using mortar at the corners to lift the tile, as pictured below.   20-25mm gap between tiles retained by fitting two 'plugs' of lime mortar 20-25mm x 20-25mm at the lower corners of the tile. The top edge of the tile must abut the batten so the bat can crawl past this rough wooden surface to the cavity. Red arrow shows bat access to cavity between the tiles and under felt between the battens. Tiles Battens Rafter Black Type 1F Bitumen Felt The garden area can be enhanced to support bat foraging. This could include the incorporation of wildlife friendly planting, e.g. Supply feeding areas. A range of wild flowering plants and berry producing shrubs, would provide a food source for birds and small animals. These plants will also provide nectar for a range of species such as butterflies and bumblebees and will attract insects for bats to feed on.
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				Areas of new planting should follow Bat Conservation Trust advice: https://cdn.bats.org.uk/pdf/Resources/Encouraging_Bats.pdf?mtime=20181101151549&focal=none
B1 Birds	No evidence of nesting birds was found during the PRA. The structure is not suitable for barn owl.	None	No further action is considered necessary.	It is recommended that a SCHWEGLER 1SP SPARROW TERRACE be mounted on one of the more sheltered elevations. This would provide for up to three sparrow families.

5.0 Bibliography

- British Trust for Ornithology (2016) www.bto.org/about-birds/nbw/putting-up-a-nest-box
- Collins, J. (ed.) (2016). Bat Surveys for Professional Ecologists — Good Practice Guidelines, 3rd edition, Bat Conservation Trust, London.
- Garland & Markham (2008) Is important bat foraging and commuting habitat legally protected?
- Google Earth (2019) accessed 2021.
- Magic database (2019) <http://www.magic.gov.uk/MagicMap.aspx> accessed 2021.
- Mitchell-Jones, A.J. (2004). Bat Mitigation Guidelines. English Nature, Peterborough.

Appendix 1: Site Location



Charnwood
Cottage, Reading,
RG4 7EB

Appendix 2: Landscape



Aerial view showing landscape structure

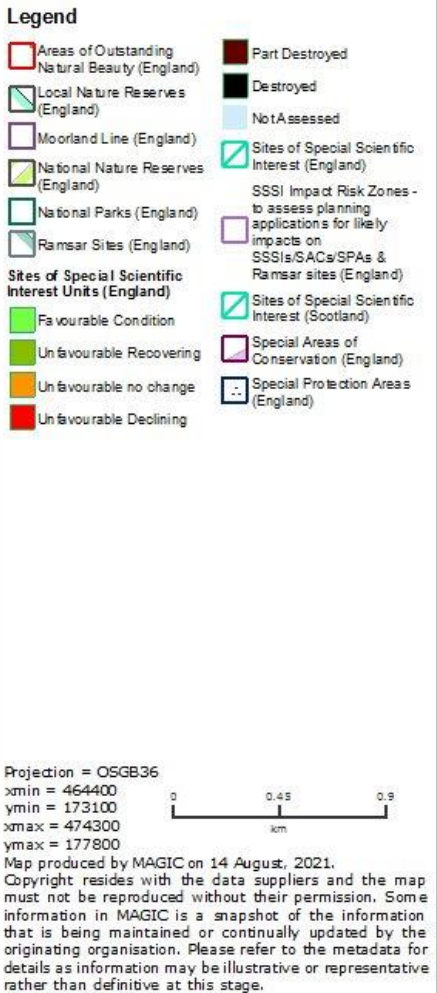
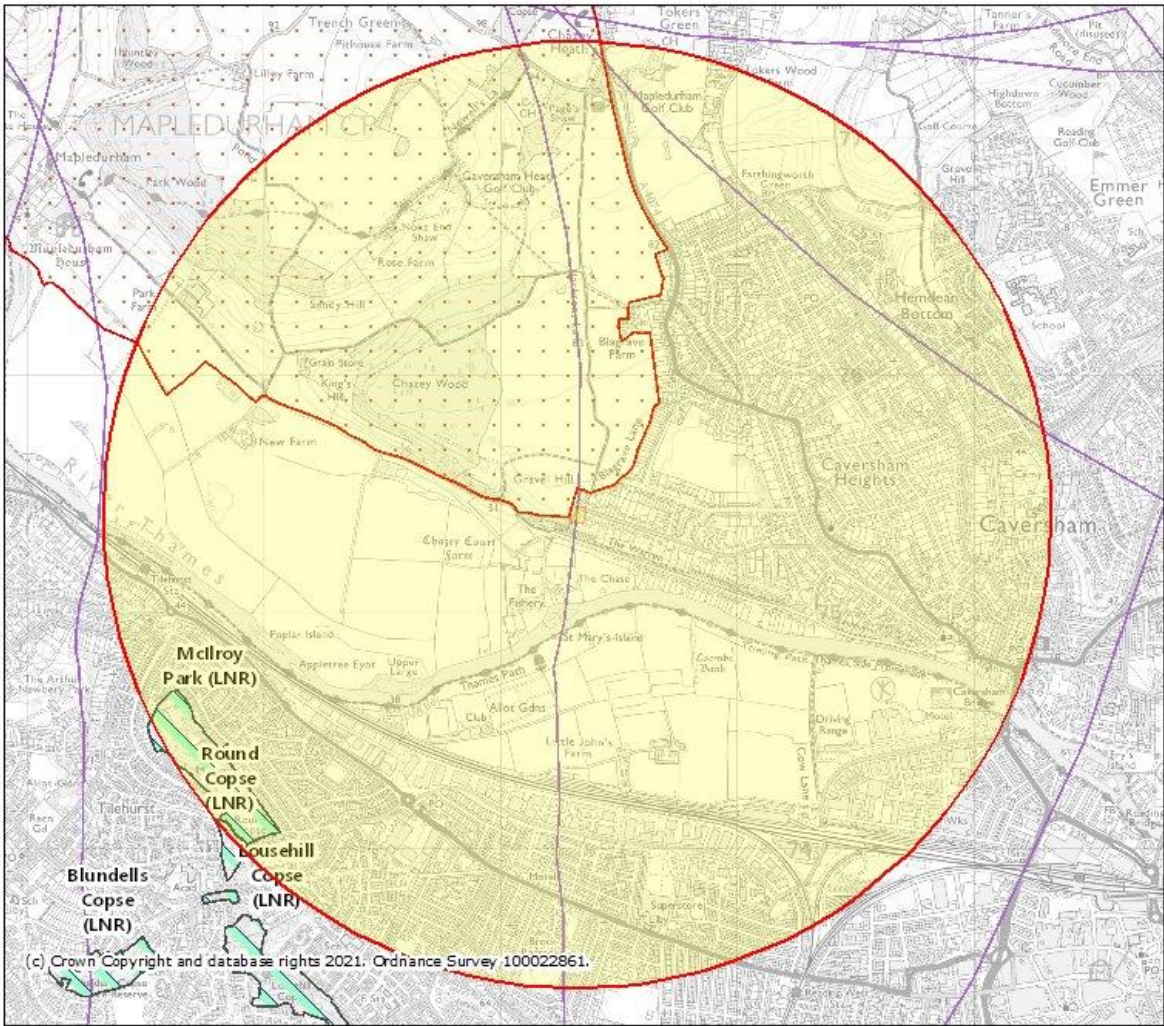
Appendix 3: Site Plans

(None available at time of writing)

Appendix 4: Desk Study Information

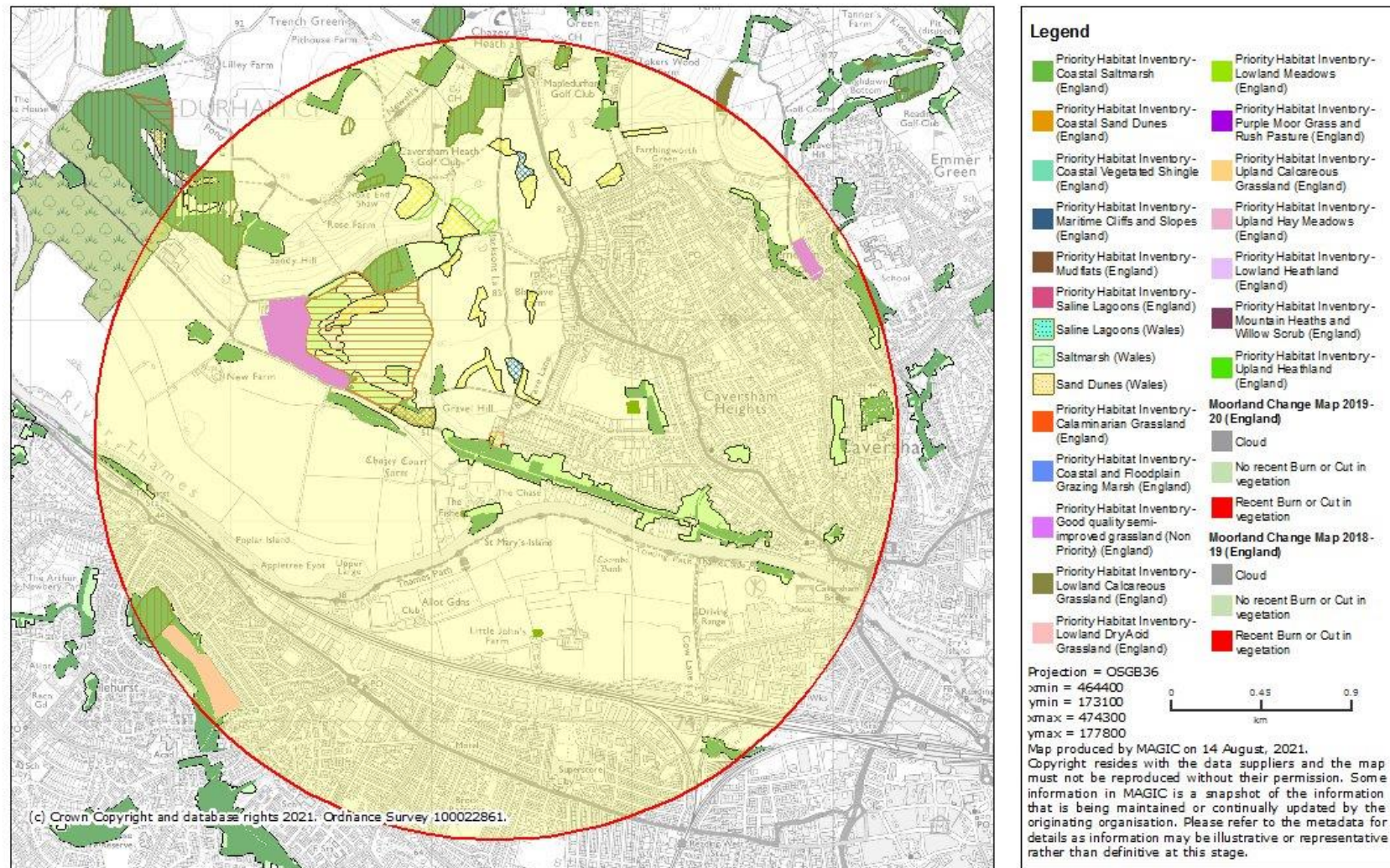
MAGiC

Designated sites



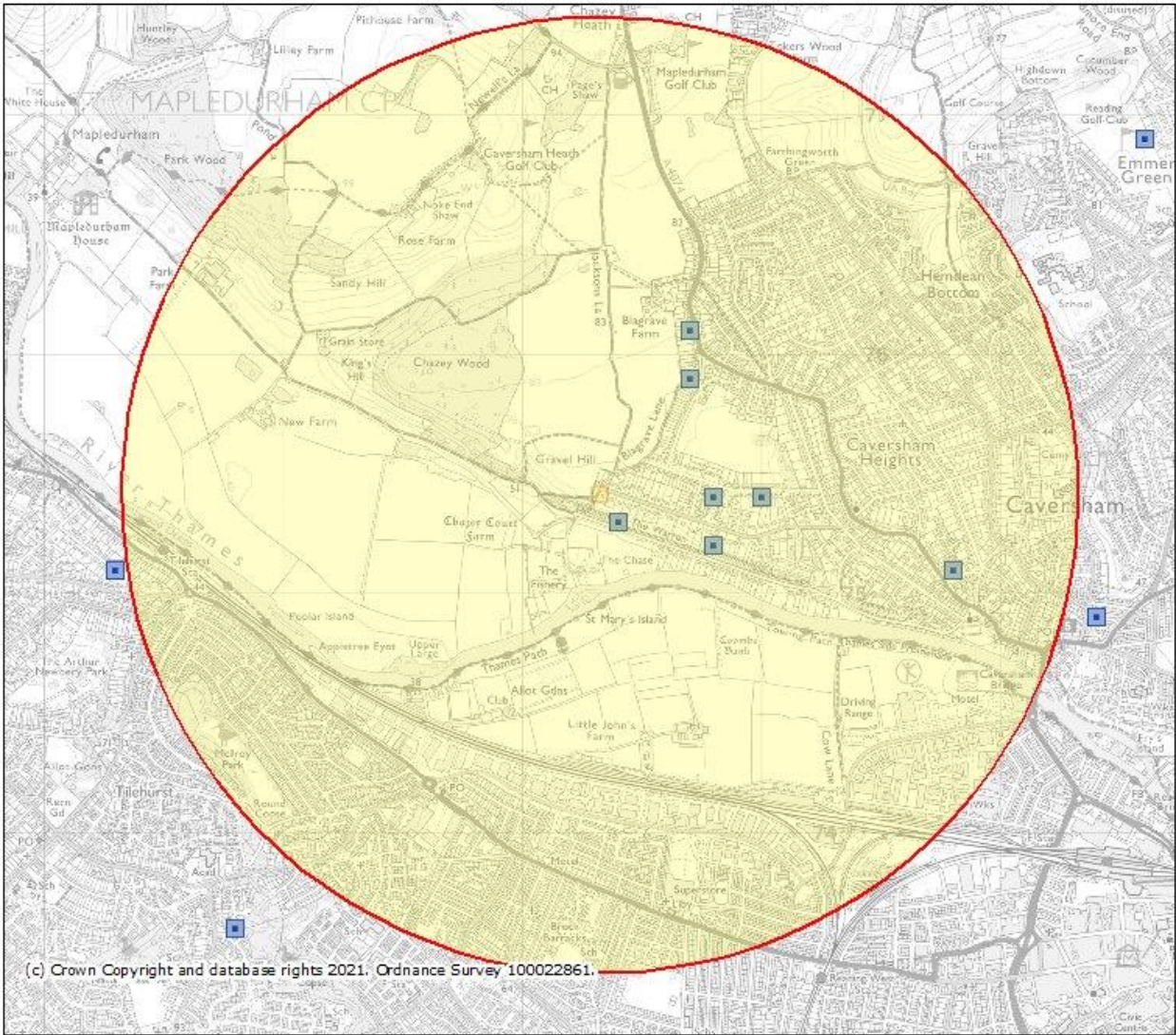
MAGiC

Habitats



MAGiC

EPSL's



Legend

Granted European Protected Species Applications (England)

- Amphibian
- Bat
- Cetacean
- Invertebrate
- Other Mammal
- Plant
- Reptile

Projection = OSGB36

xmin = 464300
ymin = 173000
xmax = 474200
ymax = 177700



Map produced by MAGIC on 14 August, 2021.
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Appendix 5: Legislation and Planning Policy related to bats

LEGAL PROTECTION

New legislation (2020)

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 came into force when Britain left the European Union on 31st January 2020. It covered amendments relevant to this survey to:

Wildlife and Countryside Act 1981: England and Wales (x1 amendment)

Conservation of Habitats and Species Regulations 2017 (x29 amendments)

All species of bat are fully protected under ***The Conservation of Habitats and Species Regulations 2017*** through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

- (a) Deliberately captures, injures or kills any wild animal of a European protected species,
- (b) Deliberately disturbs wild animals of any such species,
- (c) Deliberately takes or destroys the eggs of such an animal, or
- (d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

- (a) To impair their ability:
 - (i) To survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- (b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the ***Wildlife and Countryside Act 1981 (as amended)*** through their inclusion on ***Schedule 5***. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY (ENGLAND)**National Planning Policy Framework 2021**

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as UK Biodiversity Action Plan priority species) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; opportunities to incorporate biodiversity in and around developments are encouraged; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

Effect on development works:

A European protected species mitigation (EPSM) Licence issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law.

Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

- 1. include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;***
2. scientific and educational purposes,
3. ringing or marking
4. conserving wild animals

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.